

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

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IN RE:	CHAPTER 11
	CASE NO. 11-17461-fjb
R.J. PILGRIM, INC.,	
<u>Debtor.</u>	

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DEBTOR'S OBJECTION TO UNITED STATES TRUSTEE'S  
MOTION TO CONVERT DEBTOR'S CHAPTER  
11 CASE TO CHAPTER 7

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Now comes the Debtor in the above captioned Chapter 11 R.J. Pilgrim, Inc. ("Debtor") and objects to the United States Trustee's ("US Trustee") Motion to Convert based on the following:

1. Debtor admits.
2. Debtor denies relief should be granted.
3. Debtor admits.
4. Debtor admits.
5. Debtor admits.
6. Debtor admits.
7. Debtor admits.
8. Debtor denies. Although the exclusivity period has elapsed, that in and of itself does not mean that the Debtor will not be able to submit a feasible plan.
9. Debtor denies. The Debtor is a small corporation with one principal. Debtor has indicated to its Counsel that it has just hired a new bookkeeper to prepare the operating reports, and to clean up the books. Debtor had an in-house bookkeeper who was employed by the Debtor for seven (7) years prior to the filing. For several months the Debtor's principal was going through significant family issues at home which took her away from her business during the Chapter 11. The Debtor was relying on the in-house bookkeeper to take care of the books which she failed to do. The Debtor believes there is approximately \$16,000.00 in collectable accounts receivable that is being invoiced now. The Debtor will file the Operating Reports by March 26, 2012.

10. Debtor denies and will bring the fees current before the hearing date.
11. Debtor denies. Due to personal reasons, the Debtor has fallen behind with its obligations and is requesting a second opportunity to cure said default and submit a Plan before May 31, 2012.

Based on the above, the Debtor objects to the US Trustee's Motion to Dismiss.

Respectfully submitted,

R.J. Pilgrim, Inc.  
By its Attorneys,  
ANN BRENNAN LAW OFFICES

By: /s/Ann Brennan  
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CERTIFICATE OF SERVICE

I, Ann Brennan, do hereby certify that on March 20, 2012 I electronically filed with the Clerk of the Bankruptcy Court: DEBTOR'S OBJECTION TO UNITED STATES TRUSTEE'S MOTION TO CONVERT DEBTOR'S CHAPTER 11 CASE TO CHAPTER 7 and served same in the following manner upon the interested parties:

E-Mail Service: via the Court's CM/ECF system which sent notification of such filing to the following:

- Eric K. Bradford Eric.K.Bradford@USDOJ.gov
- John Fitzgerald USTPRegion01.BO.ECF@USDOJ.GOV

Mail Service: via Regular, first-class United States mail, postage fully pre-paid, addressed to:

R.J. Pilgrim, Inc.  
245 Country Club Way  
Kingston, MA 02364

/s/Ann Brennan  
Ann Brennan, Esq.

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